

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

MICHAEL H. RYU,

Plaintiff,

V.

DANIEL N. WHITTEN,

Defendant.

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Civil Action No. 1:15-cv-202
(TSE-TCB)

DEFENDANT’S RULE 26(a)(1) INITIAL DISCLOSURES

COMES NOW the defendant, Daniel N. Whitten, by counsel, pursuant to Fed. R. Civ. P. 26(a)(1), and sets forth the following initial disclosures based on information and documents currently known and available at this time and defendant's discovery responses already produced to the plaintiff:

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

See defendant's written responses to plaintiff's interrogatories, specifically interrogatory no. 1.

B. DOCUMENTS

See defendant's written responses to plaintiff's request for production of documents and documents produced in response to the plaintiff's request for production.

C. DAMAGES

Not applicable to the defendant.

D. INSURANCE COVERAGE

Virginia Association of Counties, Self-insurance Risk Pool coverage, local government liability policy limits - \$5,000,000.

Defendant's initial disclosures are based upon information and knowledge currently known and available to defendant at this time. Defendant reserves the right to supplement these disclosures if and as additional information or documents become known or available.

DANIEL N. WHITTEN

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2015, I electronically filed the foregoing Defendant's Rule 26(a)(1) Initial Disclosures with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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